## Case 3:73-cv-00127-MMD-WGC Document 1 Filed 01/30/20 Page 1 of 3

,	Eric Grant	
1	Deputy Assistant Attorney General	
2	Environment & Natural Resources Division	
3	United States Department of Justice	
	Guss Guarino / Tyler J. Eastman / Marisa J	. Hazell
4	Trial Attorneys, Indian Resources Section	
5	999 18 <sup>th</sup> Street, South Terrace, Suite 370	
6	Denver, Colorado 80202 Office: 303-844-1343 Fax: 303-844-1350	
7	E-mail: guss.guarino@usdoj.gov	
<i>'</i>	and	
8	P.O. Box 7611	
9	Washington, D.C. 20044 Office: 202-305-0264, 202-307-2291	
10	Fax: 202-305-0275	
	E-mail: tyler.eastman@usdoj.gov	
11	Marisa.hazell@usdoj.gov	
12	David L. Negri	
13	Trial Attorney, Natural Resources Section	
	c/o US Attorney's Office	
14	800 Park Blvd., Suite 600 Boise, Idaho 83712	
15	Tel: (208) 334-1936; Fax: (208) 334-1414	
16	E-mail: david.negri@usdoj.gov	
17	Attorneys for the United States	
18	UNITED STATES	DISTRICT COURT
19		RICT OF NEVADA
20		DV FOVETVANO G 125 1 0 5
20	UNITED STATES OF AMERICA,	IN EQUITY NO. C-125-MMD Subproceeding: 3:73-CV-00127-MMD-WGC
21	Plaintiff,	Supproceeding. 3.73 CV 00127 WIND WGC
22		SUBMISSION RE: PROPOSED
23	WALKER RIVER PAIUTE TRIBE,	SCHEDULING ORDER AND DISCOVERY PLAN
	Plaintiff-Intervener,	DISCOVERT FLAN
24	vs.	
25	WALKED DIVED INDICATION DISTRICT	
26	WALKER RIVER IRRIGATION DISTRICT, ) a corporation, et al.,	
27	)	
	Defendants.	
28		

## Case 3:73-cv-00127-MMD-WGC Document 1 Filed 01/30/20 Page 2 of 3

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	

25

26

27

28

- 1. Pursuant to the Order of December 12, 2019 (ECF No. 2591), the Court extended the time for the parties to work together to develop a proposed Scheduling Order and Discovery Plan. The Court also instructed that the parties' proposal(s) should be submitted on January 30, 2020.
- Since December 12, 2019, the principal parties have continued to confer and exchange additional proposals which have further narrowed, but not completely resolved, their differences on the content of a Scheduling Order and Discovery Plan.
- 3. Attached to this Submission as Exhibit A is the most recent proposal of the United States and Walker River Tribe, and attached as Exhibit B is the most recent proposal of the principal Defendants.
- 4. The principal parties have agreement on the following paragraphs: 1, 2.a, 3, 5, 7, 8

  (except for schedule), 9, 10, 11 (except for schedule), and 12 17. The principal parties do not have agreement at this time on the following paragraphs: 2.b d, 4, 6, 8 (as it relates to schedule), and 11 (as it relates to schedule). The principal parties ask the court to resolve the parties' remaining differences.
- 5. The principal parties will continue to confer in an effort to resolve remaining differences by the February 19, 2020 Status Conference.

Respectfully submitted this 30th day of January 2020.

/s/ Andrew "Guss" Guarino Andrew "Guss" Guarino

Attorney for the United States

## Case 3:73-cv-00127-MMD-WGC Document 1 Filed 01/30/20 Page 3 of 3

## **CERTIFICATE OF SERVICE**

It is hereby certified that on January 30, 2020 service of the foregoing was made through the court's electronic filing and notice system (ECF) to all of the registered participants.

By: <u>/s/ Andrew "Guss" Guarino</u> Andrew "Guss" Guarino

Submission re: Proposed Scheduling Order and Discovery Plan